UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

BARBARA GUINDON, et al.	:	
Plaintiffs	:	
v.	:	C.A. No. 03-335-L
AMERICAN FOAM CORPORATION, et al.	:	
Defendants	:	

MOTION FOR ENTRY OF
APPEARANCE *PRO HAC VICE*

Defendant Anheuser-Busch, Inc. hereby moves that EDWARD M. CRANE, ESQ. be admitted *pro hac vice* in the above case as associate trial counsel with local associate counsel identified below, on the following grounds:

☑ The case involves the following complex area of the law, in which *pro hac vice* counsel specializes: Mass Tort Litigation

☑ *Pro hac vice* counsel's long-standing representation of the client, Anheuser-Busch, Inc.

☐ The local trial bar lacks experience in the field of:

☐ The case involves complex legal questions under the of a foreign jurisdiction with which *pro hac vice* counsel is familiar, specifically:

☐ The case requires extensive discovery in a foreign jurisdiction convenient to *pro hac vice* counsel, as follows:

(6)

☐ It is a criminal case, and *pro hac vice* counsel is defendant's counsel of choice.

☐ Other:____

By: ______________________________

Attorney for Defendant

ATTORNEY'S CERTIFICATION FOR PRO HAC VICE ADMISSION

1. I certify that I am a member in good standing of the bar of the State of Illinois, the United States District Courts for the Northern, Central, and Southern Districts of Illinois, and the United States Court of Appeals for the Fifth, Seventh and Eleventh Circuits, without any restriction on my eligibility to practice, and that I understand my obligation to notify this Court immediately of any change respecting my status in this respect.

2. I am currently admitted and/or within the preceding 24 months have applied to be admitted in the following cases in this district: *Tammy Passa, et al. v. Jeffrey Derderian et al.*, C.A. No. 03-148-L; *Ronald A. Kingsley, et al. v. Jeffrey Derderian, et al.*, C.A. No. 03-208-L; *In Re: The Station Fire in West Warwick, Rhode Island on February 20, 2003*, M.C. No. 03-70-L; and *In Re: The Station Fire in West Warwick, Rhode Island on February 20, 2003*, M.C. No. 03-71-L.

3. I have read, acknowledge, and agree to observe and to be bound by the local rules and orders of this Court, including the Rules of Professional Conduct of the Rhode Island Supreme Court, as adopted by this Court as the standard of conduct for all attorneys appearing before it.

4. For purposes of this case, I have associated with local associate counsel identified below, and have read, acknowledge and will observe the requirements of this Court respecting the participation of local associate counsel, as set out in Local Rule 5, recognizing

that failure to do so may result in my being disqualified, either upon the Court's motion or motion of other parties in this case.

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ORDER:

This Motion is hereby ____________________

____
United States District Judge
Date: ________________

CERTIFICATION

I hereby certify that on the 19th day of September, 2003, I served a true copy of the within Motion for Entry of Appearance *Pro Hac Vice*, via first class mail, postage prepaid to the following counsel of record:

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